

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ISABEL BERMUDEZ,	:	CIVIL ACTION
Plaintiff	:	
	:	
v.	:	
	:	
	:	
DIVERSIFIED CONSULTANTS INC.,	:	
Defendant	:	NO.

NOTICE OF REMOVAL

Defendant Diversified Consultants Inc. (“Defendant” or “DCI”), by its undersigned counsel, hereby petitions this Court as follows, pursuant to 28 U.S.C. § 1441(a):

1. DCI is a defendant in an action pending in the Court of Common Pleas of Montgomery County, Civil Action No. 2018-03271 (“the State Court Action”). A true and correct copy of the Complaint in the State Court Action is attached hereto as Exhibit “A”.

2. Plaintiff in the State Court Action is Isabel Bermudez (“Plaintiff”). See Exhibit “A”.

3. Plaintiff’s State Court Action alleges violations of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.*, and the Telephone Consumer Protection Act, 42 U.S.C. § 227.

4. The State Court Action involves a question of federal law. Pursuant to 28 U.S.C. § 1331, “The district courts shall have original jurisdiction of all civil actions arising under the Constitution, laws, or treaties of the United States.”

5. Pursuant to 28 U.S.C. § 1441(a), “[a]ny civil action brought in a State court of which the district courts of the United States have original jurisdiction, may be removed by the

defendant or the defendants, to the district court of the United States for the district and division embracing the place where such action is pending.”

6. Since this case arises out of alleged violations of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.*, and the Telephone Consumer Protection Act, 42 U.S.C. § 227, Defendant may properly remove the State Court Action to this Court based on 28 U.S.C. § 1441(a).

7. This Notice has been filed with the Court within thirty (30) days after purported service of the Complaint on Defendant.

WHEREFORE, Defendant Diversified Consultants Inc. prays that the State Court Action be removed from the Court of Common Pleas of Montgomery County, Civil Action No. 2018-03271, to this Court for proper and just determination.

FINEMAN KREKSTEIN & HARRIS, P.C.

By: 
RICHARD J. PERR, ESQUIRE
MONICA M. LITTMAN, ESQUIRE
(PA Atty. I.D. Nos. 72883 & 94134)
Ten Penn Center
1801 Market Street, Suite 1100
Philadelphia, PA 19103-1628
(v) 215-893-9300; (f) 215-893-8719
rperr@finemanlawfirm.com
mlittman@finemanlawfirm.com
Attorneys for Defendant

Dated: May 11, 2018

CERTIFICATE OF SERVICE

I, RICHARD J. PERR, ESQUIRE, hereby certify that on this date I served a true and correct copy of the foregoing electronically via the Court's CM/ECF system, by first class mail, postage prepaid, and/or email or facsimile on the following:

Vicki A. Piontek, Esquire
Piontek Law Office
951 Allentown Road
Lansdale, PA 19446
(v) 877-737-8617; (f) 866-408-6735
palaw@justice.com



RICHARD J. PERR, ESQUIRE

Dated: May 11, 2018